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May 7, 2013

City of Fairfax, Department of Public Works
Attention: Mr. Alex Verzosa, Transportation Director
City Hall Annex, Room 200
10455 Armstrong Street
Fairfax, VA 22030

Dear Mr. Verzosa:

The following comments for the record are submitted by the City of Fairfax Environmental Sustainability Committee for consideration during the public comment review following the April 23, 2013 Design Public Hearing on the Northfax drainage project at the intersection of Fairfax Boulevard and Chain Bridge Road.

The committee thinks the existing proposal is a sound one, and supports efforts to control periodic flooding of the intersection. Our comment has to do with a possible omission regarding the discharge from the new stormwater culvert system into the North Fork of the Accotink Creek at the north-east end of the proposed project near Eaton Place.

As the city government is aware, the City of Fairfax is the headwater source of the Accotink Creek, and that creek is a designated impaired waterway by the state of Virginia. The Accotink is currently the subject of an ongoing action to reduce sedimentation caused by excessive stormwater runoff that endangers benthic aquatic life. The U.S. Environmental Protection Agency and Virginia have agreed that the Commonwealth will establish a Total Maximum Daily Load (TMDL) that will be implemented by incorporation into the city's and VDOT's Municipal Separate Storm Sewer (MS4) discharge permits. The TMDL will direct specific reductions of sediment and erosion in the Accotink.

Our concern is that the current plan does not indicate any methods for slowing or buffering the water before it re-enters the natural creek bed. Unless the structure is designed to buffer or slow the water, the larger conduit will increase the flow rate and the force of stormwater at the point of outfall to the North Fork of the

Accotink Creek near the northern end of Eaton Place, especially during storm events. Unless some protective engineering construction is placed at or before this outfall point, the increased forceful flow of stormwater will cause deeper erosion and sedimentation of the creek bed. It would also have the potential to worsen the problem of periodic flooding of other downstream city neighborhoods, such as Foxcroft Condominiums, which is the subject of separate city studies.

Our recommendation is that the city ensures that the Northfax plans include stormwater controls to reduce the rate and force of storm event levels of flow at the point of re-entry to the Accotink. As it is a peripheral design feature, this control construction need not delay the approval or implementation of the overall plan. However, it is very important to the city's future ability to comply with state and federal directives, and to the success of the city's future stormwater planning.

Sincerely,

Judith Fraser

Judy Fraser
ESC Chair
on behalf of the Environmental Sustainability Committee